

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RACHAEL E. MCLEOD,

Plaintiff,

v.

SOUTHEAST COMMUNITY COLLEGE
AREA, PAUL ILLICH, BRUCE
TANGEMAN, AND JOEL MICHAELIS,

Defendants.

Case No. 4:25-cv-03105-JMG-MDN

**AFFIDAVIT OF
JOSHUA J. SCHAUER**

STATE OF NEBRASKA)
) ss.
COUNTY OF LANCASTER)

I, Joshua J. Schauer, being first duly sworn upon oath, states as follows:

1. I am a natural person above the age of eighteen and have personal knowledge of and am competent to testify to the matters stated in this Affidavit.

2. I am an attorney at the law firm of Perry, Guthery, Haase & Gessford, P.C., L.L.O., and I am one of the attorneys for the defendants Southeast Community College Area (the “College”), Paul Illich (“Illich”), Bruce Tangeman (“Tangeman”) and Joel Michaelis (“Michaelis, and collectively with the College, Illich and Tangemen, “Defendants”) in the above-captioned matter.

3. I am making this Affidavit in support of Defendants’ Motion to Dismiss (ECF No. 4.)

4. On or about March 17, 2009, the College adopted Policy A-15, Equal Opportunity / Non-Discrimination-Employment, which is attached to the Index of Evidence in Support of Defendants' Motion to Dismiss as Exhibit 1 (ECF No. 6-1).

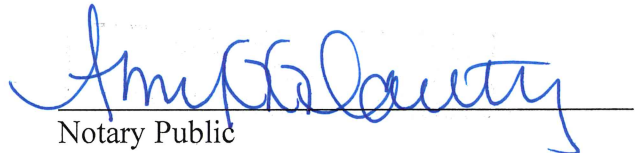
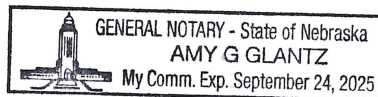
Dated this 11th day of July, 2025.



Joshua J. Schauer
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& GESSFORD, P.C., L.L.O.
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(402) 476-9200
jschauer@perrylawfirm.com

Attorney for Defendants

SUBSCRIBED AND SWORN TO before me this 11th day of July, 2025.


Notary Public